

Pomes, Michael

From: Robert Trump <rtrump@totalpetroleumservices.com>
Sent: Thursday, January 19, 2017 4:09 PM
To: Drouare, Douglas; Sac & Fox Truck Stop
Cc: Pomes, Michael; robwandrew@mac-const.com; Chris Kinn; mwatson@terranext.net; Kelly Cratsenburg; William_Milliard@us.crawco.com; Kyle Minden
Subject: RE: Update at Sac and Fox Truck Stop [WARNING: SPF validation failed]
Attachments: removed.txt

Categories: EZ Record - Shared, Record Saved - Shared

Dear Mr. Drouare,

I have been reviewing the Federal Code of Regulations Exemptions under 40. 261.4 as it relates to the following:

(10) Petroleum-contaminated media and debris that fail the test for the Toxicity Characteristic of § 261.24 (Hazardous Waste Codes D018 through D043 only) and are subject to the corrective action regulations under part 280 of this chapter.

The chart used to determine whether contaminated media fails this test identifies a number of elements but the one which I have pertinent data on is Benzene which is listed as D018 with a regulatory threshold of .5 ppm.

My question: Am I correctly interpreting this chapter to mean that contaminated media and debris from this site that contains a level of Benzene, in excess of 0.5 ppm is considered "non-exempt" status for Petroleum-contaminated media and as such is considered a hazardous material based on that characteristic?

It appears to me that further reading states it is to be analyzed per the TCLP test method 1311. Now the analytical results which we have today are not per TCLP 1311 but per method 8260/OA1.

This brings me to my next question regarding the rule of 10. I'm familiar with this being used when a land fill determines whether to accept material based on the lead content. Does this rule apply to a toxic material such as benzene?

Can you provide your guidance regarding this particular site and whether or not I am using the correct data to make a determination to further excavate or leave and remediate in situ.

Thanks,
Robert

Hello Mr. Drouare,

Thank you for your input below.

Further analytical has just been received on the samples taken from the tank pit west, north, and east.

I agree with removal during repairs. However, you also made the comment removing grossly impacted source material is a good thing. I also agree with this statement. We provided Waste Management with the analytical and profile information based on drilling soil samples. That is what we were approved for hauling to the land fill.

However, the new analytical just in confirms the majority of contaminate is toward the east of the tank pit.



Table 2.0 Soil/Water Analytical Results Tank
Excavation
Fox Truck Stop
75 Highway
Sac and
1346 US
Powhatten,
Kansas

Date Sampled	Sample ID	Field Screening (ppm)	Benzene (mg/kg)	Toluene (mg/kg)	Ethylbenzene (mg/kg)	Total Zylenece (mg/kg)	Total BTEX	Naphthalene (mg/kg)	MtBI (mg/kg)
Tier 2 RSK, Soil Pathway - Non-Residential			28.2	29,800	145	1,410	-	64.7	1,050
Tier 2 RSK, Soil to Ground Water - Non-Residential			0.168	51.2	65.6	809	-	0.659	1.66
1/4/2017	Grvl SL Fill - 01	0.3	ND	ND	ND	ND	-	0.87	ND
1/4/2017	Grvl SL Fill - 02	59.5	0.0925	0.804	0.313	19	-	3.53	ND
1/10/2017	West Wall (Near West Dispenser)	95.7	0.163	1.58	2.97	27.6	-	4.8	ND
1/10/2017	North Wall (NE C of Excavation)	2,751	0.617	0.317	6.35	6.98	-	0.802	ND
1/10/2017	Bottom 1 (Center of Failed Tank)	36.7	0.408	ND	0.227	0.682	-	ND	ND
1/10/2017	Bottom 2 (East end of Failed Tank)	3,657	10.2	47.4	37	173	-	3.2	ND
11/11/2017	UST Pit Water	-	0.603	0.166	0.247	1.2	-	0.103	ND

Field screening samples analyzed in the field with a photoionization detector

TPH - Total Petroleum Hydrocarbons

LRH - Low Range Hydrocarbons

MRH - Medium Range Hydrocarbons

HRH - High Range Hydrocarbons

ND - Non Detect

NM - Not Measured

PNDG - Analytical Pending at Lab

Values in Bold Exceed Tier 2 RSKs

RSK - Risk-Based Standards for Kansas

Dated September 1, 2015

The highlights in red depict those parameters which outside acceptable ranges for Tier 2 Risk Parameters.

Based solely on this analytical it would appear heavier contaminants are showing up in an easterly direction. That seems reasonable as that is the direction of ground water flow. The question then becomes whether these results would be considered gross contamination. In my opinion the results of Tier 2 Soil to Ground Water contamination would reflect gross contamination and would warrant excavation. However, I need to provide this new data to Waste Management to determine whether they may accept this at the land fill. I will submit this to them today.

We are researching some additional remedial methods which may be relevant to this site. There will be more to come shortly in that regard.

I will let everyone know asap whether Waste Management will accept this material as it is.

Should anyone have additional comments to add to the discussion then they are welcomed.

Sincerely,

Robert L. Trump
Total Petroleum Services

From: Drouare, Douglas [mailto:drouare.douglas@epa.gov]
Sent: Wednesday, January 18, 2017 11:51 AM
To: Robert Trump <rtrump@totalpetroleumservices.com>; Sac & Fox Truck Stop <sacfoxtsmgr@jbntelco.com>
Cc: Pomes, Michael <pomes.michael@epa.gov>
Subject: RE: Update at Sac and Fox Truck Stop [WARNING: SPF validation failed]

We have finished reading the update provided. For major releases, such as what occurred at the truck stop, it usually proves to be difficult to dig your way out of the problem. Excavation of contaminated soil and disposal of it or treatment of it is costly and disruptive to businesses where the work is being performed. If the material goes to the landfill you may be just transferring your liability to another site. In most instances responsible parties get what they can while they are performing repairs (removing grossly impacted source material is a good thing) and then rethink how they approach the rest of the contaminants. There are viable approaches to addressing the contaminants in place. Please keep us updated on the ongoing work.

Thanks,

Douglas E. Drouare, CPG
USEPA, Region 7, AWMD - STOP
11201 Renner Boulevard
Lenexa, Kansas 66219
(913) 551-7299
drouare.douglas@epa.gov

From: Robert Trump [mailto:rtrump@totalpetroleumservices.com]
Sent: Wednesday, January 11, 2017 4:49 PM
To: Sac & Fox Truck Stop <sacfoxtsmgr@jbntelco.com>
Cc: robwandrew@mac-const.com; Kelly Cratsenburg <Kelly.Cratsenburg@anteagroup.com>; Kyle Minden <kminden@edtkc.com>; Meredith Watson <mwatson@terranext.net>; Chris Kinn <ckinn@terranext.net>; Drouare, Douglas <drouare.douglas@epa.gov>
Subject: Update at Sac and Fox Truck Stop [WARNING: SPF validation failed]

Attached is an update for Sac and Fox activities. If I have missed anyone in the send list, please forward to them or let me know and I will send another including their address.

Thanks and please comment.

Total Petroleum Services LLC

Robert L. Trump
913-461-5985
www.totalpetroleumservices.com

